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**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF UTAH, CENTRAL DIVISION**

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SMASH TECHNOLOGY, LLC, a Nevada  
limited liability company; and MICHAEL  
ALEXANDER, an individual;

Plaintiffs,

vs.

SMASH SOLUTIONS, LLC, a Delaware  
limited liability company; JERRY "J.J."  
ULRICH, an individual; SMASH  
INNOVATIONS, LLC, a Wyoming limited  
liability company; and FERACODE, LLC, a  
Utah limited liability company,

Defendants.

**REQUEST TO SUBMIT FOR  
DECISION ON DEFENDANTS' SHORT  
FORM DISCOVERY MOTIONS  
(DN 77, 78, & 79)**

**(Hearing Requested)**

Civil No. 2:19-cv-00105-TC-PMW

Judge Tena Campbell

Magistrate Judge Paul M. Warner

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SMASH SOLUTIONS, LLC, a Delaware  
limited liability company; JERRY "J.J."  
ULRICH, an individual; and JOHN DOES 1-3;

Counterclaim Plaintiffs,

vs.

SMASH TECHNOLOGY, LLC, a Nevada  
limited liability company; and MICHAEL  
ALEXANDER, an individual;

Counterclaim Defendants.

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Defendants and Counterclaim Plaintiffs Smash Solutions, LLC, Jerry Ulrich, and Smash Innovations, LLC, through their counsel of record Matthew C. Barneck, Zachary E. Peterson, and Kristina H. Ruedas of RICHARDS BRANDT MILLER NELSON, respectfully submit for decision their Short Form Discovery Motions filed March 2, 2020 (Docs. 77, 78, 79).

Defendants filed their Motions on March 2, 2020. Plaintiffs filed their Responses on March 10, 2020. Therefore, the Motions are ready for decision. Pursuant to Local Rules 7-1(f) and 37-1(a)(7)(B), Defendants request a hearing on their Motions. Good cause exists for a hearing because Plaintiffs' Responses misstate the record and Defendants should be given a chance for rebuttal. At the Court's request, Defendants can also provide further briefing on these issues.

DATED this 11<sup>th</sup> day of March, 2020.

RICHARDS BRANDT MILLER NELSON

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 11<sup>th</sup> day of March, 2020, I electronically filed the foregoing **Request to Submit for Decision on Defendants' Short Form Discovery Motions [DN 77, 78 & 79] (Hearing Requested)** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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